

Sheri Thome, Esq.
Nevada Bar No. 08657
**WILSON, ELSE, MOSKOWITZ,
EDELMA & DICKER LLP**
6689 Las Vegas Blvd. South, Suite 200
Las Vegas, NV 89119
Telephone: (702) 727-1400
Facsimile: (702) 727-1401
sheri.thome@wilsonelser.com
Attorneys for Plaintiff Flectat2 LTD

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

FLECTAT2 LTD, a United Kingdom corporation,

Plaintiff,

v.

CANCUN, LLC, a Nevada Limited Liability
Company; ERIKA AYALA AGUILAR, an
individual,

Defendants.

CASE NO: 2:22-cv-01033-CDS-VCF

**NOTICE OF VOLUNTARY DISMISSAL
WITH PREJUDICE**

Plaintiff Flectat2 LTD ("Flectat2"), by and through its undersigned counsel, Sheri Thome, Esq., of Wilson, Elser, Moskowitz, Edelman & Dicker LLP, hereby voluntary dismisses the above-captioned matter in its entirety, with prejudice, pursuant to FRCP 41(a)(1)(A)(i).

Defendants have not filed an answer or motion for summary judgment. Accordingly, dismissal is appropriate under FRCP 41(a)(1)(A)(i).

Each party will bear their own fees and costs incurred to date.

DATED this 31st day of May, 2023.

**WILSON, ELSE, MOSKOWITZ, EDELMA
& DICKER LLP**

BY: */s/ Sheri Thome*

Sheri Thome, Esq.
Nevada Bar No. 008657
6689 Las Vegas Blvd. South, Suite 200
Las Vegas, NV 89119
Telephone: (702) 727-1400
Facsimile: (702) 727-1401
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

Pursuant to FRCP 5, I certify that I am an employee of WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP and that on this 31st day of May, 2023, I served a true and correct copy of the foregoing **NOTICE OF VOLUNTARY DISMISSAL WITH PREJUDICE** as follows:

- ☒ by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;
- ☒ via electronic means by operation of the Court's electronic filing system, upon each party in this case who is registered as an electronic case filing user with the Clerk;
- ☐ via hand-delivery to the addressees listed below;
- ☐ via facsimile;
- ☐ by transmitting via email the document listed above to the email address set forth below on this date before 5:00 p.m.

Erika Ayala Aguilar
102 Highland Crown Rd.
Las Vegas, NV 89141

Cancun, LLC
c/o Corporate Service Center, Inc., Registered Agent
1450 Vassar St. Reno, NV 89502

BY: /s/ Lani Maile
An Employee of
WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP